

From: [Turner, Philip](#)
To: [Miller, Garyg](#)
Cc: [Sanchez, Carlos](#)
Subject: Re: Steve Ells Comment on San Jacinto FS
Date: Thursday, April 07, 2016 10:50:40 AM

OK. In the near term, some items for thought:

Some of it has to do with some of the things HQ wasn't really happy with, but were more recent science (e.g., bioavailability adjustment of .5 (SJ) or 1 (HQ)). I'll have to double check what the Corp thought about that. As far as I recall, we never made a final decision on which to go with.

Some has to do with the fact that people are exposed to fish contaminated from numerous sources. If we base the SJ cleanup on fish tissue alone, then we are in a way blaming the site for the entire watershed

We also steered away from the subsistence scenario early on. Reasons included no one being allowed to fish from the site (theoretically), the industrial nature of the entire area (most fishing likely occurred away from the site). I know you were revisiting the notion of including the subsistence scenario not too long ago, but I do not recall the decision. That would make a huge difference in the clean-up level.

I think Some of the number below are for tissue, and not sediment... making them much smaller. I'll have to go digging through these other sites to determine which is which.

From: Miller, Garyg
Sent: Thursday, April 7, 2016 9:48 AM
To: Turner, Philip
Cc: Sanchez, Carlos
Subject: FW: Steve Ells Comment on San Jacinto FS

Phil,

Below is an email from Steve Ells asking about the San Jacinto sediment cleanup level being higher than others & I couldn't find if we ever had an answer; this will come up again in the NRRB, so we should be able to talk to this. Also, I am revising the feasibility study & need to include a PRG we are going with, so can you check into this?

Thanks,

Gary Miller



9768812

Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: Turner, Philip
Sent: Tuesday, July 01, 2014 8:41 AM
To: Miller, Garyg <Miller.Garyg@epa.gov>
Subject: RE: Steve Ells Comment on San Jacinto FS

Multiple sources themselves would not make it higher, but other fishing options would. For example, in the San Jacinto River folks can fish in lots of different places. At these sites... maybe their fishing spots are more restricted.

From: Miller, Garyg
Sent: Tuesday, July 01, 2014 8:34 AM
To: Turner, Philip
Subject: RE: Steve Ells Comment on San Jacinto FS

Phil,

Those other sites may have been a single source, but I'm not clear on why multiple sources would make it higher???

Gary Miller
EPA Remedial Project Manager
214-665-8318
miller.garyg@epa.gov

From: Turner, Philip
Sent: Monday, June 30, 2014 12:03 PM
To: Miller, Garyg
Subject: RE: Steve Ells Comment on San Jacinto FS

There are PCLs for fishing... Recreational Fisher and Subsistence Fisher (although the subsistence fisher was not carried forward in the FS). I wonder If fish from these other site were contaminated by dioxins of a single source. San Jac fish have accumulated stuff from all over the watershed.

From: Miller, Garyg
Sent: Thursday, June 26, 2014 7:57 AM
To: Turner, Philip

Subject: Steve Ells Comment on San Jacinto FS

Phil,

Below is a comment the Steve Ells made regarding the San Jacinto cleanup level – can you prepare a response?

Thanks,

Gary Miller
EPA Remedial Project Manager
214-665-8318
miller.garyg@epa.gov

5 – Why is the sediment PCL of 220 ppt based on a recreational visitor scenario? It is very high compared to other sites. At all dioxin sites, the cleanup level or remediation goal is much lower for fish consumption. There is an RAO for fish consumption, but no corresponding PCL or RG. At Centredale Manor it was 15 ppt, and at the Passaic River, the Proposed Plan used 7.1; both were based on a HI of 1. The risk-based protective concentration in fish tissue at the Passaic is 1.4 ppt. The current conc. of dioxins in fish should be stated, as well as the baseline risk that exposure pathway represents.
